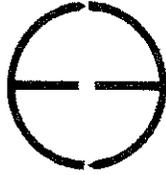


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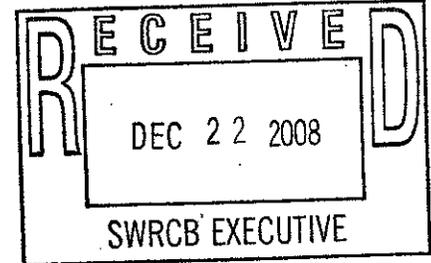
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December 22, 2008

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100



RE: Comment Letter – Proposed Recycled Water Policy

Dear Ms. Townsend:

The California Council for Environmental and Economic Balance (CCEEB) is a non-partisan, non-profit organization of business, labor and community leaders that seeks to achieve the State's environmental goals in a manner consistent with a sound economy. On behalf of CCEEB, we offer the following comments with respect to the Boards' November 21, 2008 Notice requesting comments on the proposed Recycled Water Policy.

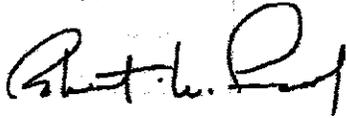
CCEEB's primary concern with the policy released with the November 21, 2008 Notice is its scope and applicability. On February 15, 2008, the State Board issued a revised Policy which contained a definition of recycled water, for purposes of the Policy, as "limited to municipal wastewater sources." However, the State Board did not adopt that February 2008 proposal. Instead, the Board chose, at the request of primarily wastewater treatment stakeholders, to allow them to redraft and resubmit a new recycled water proposal for the Boards' consideration. CCEEB and other industrial stakeholders were not a part of this group formulating this new proposal.

The group submitted a new draft proposal in August of 2008 which the Board accepted and noticed for consideration on November 21, 2008. On page 2 of the Draft Recycled Water Policy (dated November 4, 2008) it states, "This policy focuses on increasing the use of recycled water from municipal wastewater sources." This appears to be the only statement purportedly limiting the application of the policy to municipal wastewater sources. If so, this limitation is extremely ambiguous and unclear. Does it exclude recycled water from non-municipal sources or merely imply that they are a lower priority but covered nonetheless?

CCEEB believes that the Board was correct in excluding non-municipal sources from the February 2008 policy and that these sources should be expressly excluded from this November 4, 2008 draft proposal. The definition in the original February 15, 2008 proposal would accomplish this result.

We appreciate this opportunity to comment on the Boards' proposed Recycled Water Policy. If we can provide any further information or be of any additional assistance please feel free to contact Bob Lucas at 916-444-7337.

Sincerely,



Robert W. Lucas
Waste & Water Quality Project Manager



Gerald D. Secundy
President

cc: Members of the State Water Resources Control Board
Dorothy Rice, Executive Director, SWRCB
Jonathan Bishop, Chief Deputy Director, SWRCB